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11
12 UNITED STATES DISTRICT COURT
13
14 DISTRICT OF NEVADA

15 KATHRYN MAYORGA, an individual)
16) 2:19-cv-00168-JAD-DJA
17 Plaintiff,)
18 vs.)
19)
20 CRISTIANO RONALDO, individually,)
21 Does I-XX and Roe Corporations I-XX;)
22 Defendants.)
23)

24 **STIPULATION TO EXTEND THE TIME FOR PLAINTIFF AND DEFENDANT'S**
25 **RESPONSES TO THE NOTICE REGARDING REAL PARTY IN INTEREST'S, LAS**
26 **VEGAS METROPOLITAN POLICE DEPARTMENT, CRIMINAL INVESTIGATIVE**
27 **FILE [ECF 172] AND THE NEW YORK TIMES COMPANY'S MOTION TO**
28 **INTERVENE [ECF 176]**
(THIRD REQUEST)

IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN Plaintiff
KATHERINE MAYORGA by and through her attorney LESLIE MARK STOVALL, ESQ. and
Defendant, CRISTIANO RONALDO, by and through his attorney PETER S. CHRISTIANSEN,
ESQ., that the time for Plaintiff and Defendant's responses to the Notice Regarding Real Party In
Interest's Las Vegas Metropolitan Police Department, criminal investigative file [ECF 172] and

1 that responses to The New York Times Company's Motion to Intervene [ECF 176], currently
2 due on January 25, 2022, be extended to February 8, 2022.

3 Plaintiff's counsel initially requested a one-week extension of time for Plaintiff to file the
4 foregoing responses. Defendant did not object and requested a reciprocal extension of time.
5 Plaintiff's counsel was unable to complete drafting the subject responses on or before the initial
6 deadline, because Plaintiff's counsel and his family tested positive and suffered the Covid-19
7 virus over the holidays which prevented Plaintiff from reviewing and completing plaintiff's
8 response to the notice regarding real party in interest, Las Vegas Metropolitan Police
9 Department, criminal investigative file [ECF 172] as well as responding to the New York Times
10 Company's Motion to Intervene [ECF 176].

11 Defendant's Counsel also had to dedicate substantial time to preparation for trial in other
12 cases and has experienced staffing shortages associated with the recent uptick in COVID-19
13 cases. Accordingly, Defense Counsel likewise asserted good cause for the initial one week
14 extension of the response deadlines.

15 Since the time this Court granted the parties second request for extension [ECF 179]
16 making the foregoing responses due on January 25, 2022, respectively, the Parties have been
17 diligently working on their responses. However, the parties are engaged in continued
18 negotiations, in an attempt to resolve and/or further narrow the issues to be determined by this
19 Court. As of the date of filing the instant stipulation, negotiations have not yet reached any final
20 resolution. Accordingly, good cause exists to extend the instant deadline for an additional two
21 weeks in order to allow a continued and meaningful opportunity to exchange draft stipulations to
22 further explore such a resolution. As such, the Parties stipulate to the same.

2:19-cv-00168-JAD-DJA
Mayorga v. Ronaldo
Stipulation to Extend time for Plaintiff
and Defendant's responses to [ECF 172, 176]

Dated this 25th January, 2022
STOVALL AND ASSOCIATES
/s/ Leslie Mark Stovall

LESLIE MARK STOVALL, ESQ.
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Dated this 25th January, 2022
CHRISTIANSEN TRIAL LAWYERS
/s/ Kendelee L. Works

PETER S. CHRISTIANSEN, ESQ.
KENDELEE LEASCHER WORKS, ESQ.
Christiansen Trial Lawyers
710 South 7th Street, Suite B
Las Vegas, NV 89101
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ORDER

IT IS HEREBY ORDERED that Plaintiff and Defendant's responses to the notice regarding real party in interest's, Las Vegas Metropolitan Police Department, criminal investigative file [ECF 172] and further that the parties' responses to The New York Times Company's Motion to Intervene [ECF 176], currently due on January 25, 2022, be extended to February 8, 2022.

DATED this ____ day of January, 2022

THE HONORABLE DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

Respectfully Submitted:
Dated this 25th January, 2022
STOVALL AND ASSOCIATES
/s/ Leslie Mark Stovall

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Dated this 25th January, 2022
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